



# College Readiness Program Audit

ASSURANCE • INSIGHT • OBJECTIVITY

## First Follow-up Report

**Audit Plan Code: 20-14**

Management has implemented seven (7) of the 10 corrective action plan (CAP) activities to address the findings and recommendations in the original report. The remaining three (3) activities are due June 1, 2020. One (1) activity is in progress and two (2) activities have not been started.



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## Abbreviations

CCRP	College and Career Readiness Planner
CAP	Corrective Action Plan
CTE	Career and Technical Education
CUM	Student Cumulative Education Record
DLA	Distinguished Level of Achievement
EPISD	El Paso Independent School District
HB	House Bill
IA	Internal Audit
ICQ	Internal Control Questionnaire
IIA	Institute of Internal Auditors
PGP	Personal Graduation Plan
STEM	Science, Technology, Engineering and Math
TAC	Texas Administrative Code
TAP	Texas Achievement Plan
TEA	Texas Education Agency
TEAMS	Total Education Administration Management System (Prologic Technology Systems), school management system utilized by the District.
TEC	Texas Education Code
TSDE	Touch System Data Entry (EPISD CTE course)



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## Background

The Institute of Internal Auditors' (IIA) International Standards for the Professional Practice of Internal Auditing, Performance Standard 2500 - Monitoring Progress, require we "...establish and maintain a system to monitor the disposition of results communicated to management." Internal Audit has established the Corrective Action Plan (CAP) process to meet this requirement. The process includes monitoring and reporting whether management has implemented corrective actions to address audit findings, observations, and recommendations.

Internal Audit issued the College Readiness Program Audit Report to District management and administration on September 11, 2019. We performed the audit as part of the Board approved 2018-2019 Internal Audit Plan. The objective of the audit was to determine compliance with House Bills 5 and 18 Instruction in High School, College, and Career Preparation, Personal Graduation Plan (PGP), and related local requirements specific to the creation of a PGP and the selection of an endorsement(s). The scope of the audit included college and career preparation records and documentation for students enrolled during the 2018-2019 school year and graduates of the 2017-2018 school year.

The original audit report included seven (7) findings and three (3) recommendations. In summary, the district had a framework in place to support students in middle and high school with instruction in high school readiness, career, and the creation of a personal graduation plan. However, there were insufficient written procedures to support the consistency, continuity of the process, and documentation requirements. For reference, a summary of original audit report findings is provided on **Exhibit A**. District management and administration agreed with our recommendations and developed a corrective action plan (CAP) with 10 activities.

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## Objective and Scope

The objective and scope of this follow-up review were to determine whether management implemented the 10 CAP activities or took other actions to address the seven (7) findings and three (3) recommendations outlined in the College Readiness Program Audit Report.

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## Methodology

To achieve our follow-up review objective, we:

- Held meetings and communicated with persons responsible for carrying out the CAP activities.
- Reviewed supporting documentation maintained by management as evidence of completion of the CAP activities provided to Internal Audit.

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## Inherent Limitations

This was a limited scope follow-up review covering only the actions taken by administration to address the original audit findings and recommendations stated in the Objective and Scope section of this report. No representations of assurance are made to other areas or periods not covered by this follow-up review.

## Summary of Results

CAP Activities	Implemented	Overall CAP Status
10	7	Open

Management implemented seven (7) of the 10 corrective action plan activities to address the seven (7) findings and three (3) recommendations in the original audit report. The remaining three (3) activities are due June 1, 2020.

The CAP will remain open until all activities have been implemented or deemed as no longer necessary/applicable. Internal Audit will continue to monitor the implementation of the CAP and report to the Board any corrective activities not effectively implemented or unduly delayed.

## Original Recommendations and Status of CAP Activities

The original recommendations, the person(s) responsible, and the status of the CAP activities are outlined below:

1

**Original Recommendation:** We recommend Counseling and Advising and CTE, develop written procedures for instruction in High School, College, and Career Preparation. The procedures should be used for training and distributed to stakeholders. The procedures should be maintained and updated as needed by the appropriate data owner(s). The written procedures should define documentation requirements for the following:

1. PGP/Endorsement Documentation,
2. Appropriate signatures,
3. Foundation High School Program, Endorsement Opt-Out Agreement,
4. Foundation High School Program (HB 5) Change in Graduation Plan, and the required documentation, and
5. Quantity and quality of counseling sessions with students regarding High School, College and Career, including documentation requirements.

The written procedures at a minimum should include the following:

- a. Identify who is responsible, accountable, consulted, and/or informed,
- b. Clear objective(s), requirements, and detailed instructions on how to perform the task,
- c. Clearly define when the task needs to take place,
- d. Define references to relevant forms, documents, and reference material,
- e. May include graphic diagrams or process flow charts if needed, and define records retention and document update requirements.

**Management and Leadership Response:** Agreed with our recommendation and incorporated into the CAP as activities one (1), two (2), three (3), four (4), five (5), eight (8), nine (9), and ten (10) as follows:

**Activity 1:** "Revise flowchart with outlined steps for the requirement of the Endorsement Letter on the electronic platform to be: a) signed initial PGP/endorsement letter at the end of 8th Grade; b) signed endorsement letter each time there is a CHANGE in Endorsement; c) and signed endorsements letters to filed in the CUM Folder."

**Person Responsible:** Director Counseling and Advising; School Leadership Facilitators; High School Guidance and Instruction Assistant Principals; Executive Director – Student and Parent Services



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**Status:** Implemented

**Activity 2:** “Revise Performance Acknowledgement Form to include outlined steps for documentation in the CUM.”

**Person(s) Responsible:** College Readiness Facilitator and Executive Director of Curriculum & Instruction

**Status:** Not Started – Due June 1, 2020

**Activity 3:** “CTE will develop step by step procedural guidelines for the creation of a personal graduation plan and endorsement selection in the Touch Systems Data Entry (TSDE) Course.”

**Person(s) Responsible:** Director CTE; CTE Facilitator; and Executive Director Curriculum & Instruction

**Status:** Not Started – Due June 1, 2020

**Activity 4:** “Revise the Change in Graduation Plan Form to include: a) Counselor Assurance that TEA mandated form “Foundation High School Program, Endorsement Opt-Out Agreement” has been provided to Parent; b) appropriate documentation required is attached and c) signed documentation is filed in CUM.”

**Person(s) Responsible:** Director Counseling and Advising; Executive Director of Student and Parent Services; School Leadership Facilitator; and High School Guidance and Instruction Assistant. Principals

**Status:** Implemented

**Activity 5:** “Revise written CCRP procedures for entering counseling notes: Mass and/or Individual.”

**Person(s) Responsible:** Director Counseling and Advising; School Leadership Facilitators; High School Guidance and Instruction Assistant Principals; and Lead Counselors

**Status:** Implemented

**Activity 8:** “Revise the Middle and High School Student Course Audit Protocol Form and Campus Counseling Program Objectives (CCPO) to reflect: a) review of Endorsements in 8th, 9th and 11th grade and b) CCRP procedures for entering counseling notes: Mass and/or Individual for CCMR a minimum of twice a year: Fall and Spring.”

**Person(s) Responsible:** Director Counseling and Advising; School Leadership Facilitators; High School Guidance and Instruction Assistant Principals; and Lead Counselors

**Status:** Implemented

**Activity 9:** “Develop a Written Request to lock CCRP, so students cannot make edits to their PGP/endorsement to be approved by campus administration after registration is complete.”

**Person(s) Responsible:** Director Counseling and Advising; School Leadership Facilitators; High School Guidance and Instruction Assistant Principals; and Lead Counselors

**Status:** Implemented

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**Activity 10:** “Revise Counselor Job Descriptions to include requirements for coding CCRP entries and CA Director evaluation component.”

**Person(s) Responsible:** Director Counseling and Advising; Lead Counselors; and Campus Administrator

**Status:** Implemented

2

**Original Recommendation:** We recommend management conduct an evaluation to determine if counselors are provided sufficient time to meet and counsel individual students yearly regarding High School, College, and Career Preparation as required by TEC 33.007.

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**Management and Leadership Response:** Agreed with our recommendation and incorporated into the CAP as activities six (6), seven (7), and ten (10).

**Activity 6:** “Upon approval by Analytics, Strategy, Assessment, and PEIMS (ASAP), Campus Counselors and campus administrators will participate in External Focus Groups and/or Research studies to determine level of implementation of HB 5 and perceptions of counselor roles in schools as determined by researchers...The objectives of the study are as follows:

1. Gain an understanding of Title I principals' perceptions, attitudes, and understanding of the school counseling profession.
2. Increase understanding of how school counselors are utilized in Title 1 schools and how those decisions are made.
3. Gain an understanding of the school counselor roles that principals' value. Note: Research findings will be shared with counselors and campus/District administration.”

**Persons Responsible:** Director Counseling and Advising; Lead Counselors; and Analytics, Strategy, Assessment and PEIMS (ASAP)

**Status:** Implemented

**Activity 7:** “Campus School Counselors will participate in two Counseling and Advising Student Service Surveys based on the American School Counselor Association standards; the two surveys will take place in Fall 2019 and Spring 2020. Surveys will focus on counselors time/effort on addressing student needs as noted in the ASCA National Model Components: Guidance, Responsive, Individual, System Supports.”

**Persons Responsible:** Director Counseling and Advising; School Leadership Facilitators; High School Guidance and Instruction Assistant Principals; and Lead Counselors

Refer to recommendation one (1) for details on CAP activity ten (10).

**Status:** In Progress – Due June 1, 2020

3

**Original Recommendation:** Guidance and Advising should ensure that written procedures and training include the documentation in CCRP of individual counseling sessions with students regarding post-secondary and career readiness. This should include documenting all counseling sessions and/or changes to a student's PGP/endorsement, which include change of endorsement.

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**Management and Leadership Response:** Agreed with our recommendation and incorporated into the CAP as activities one (1), two (2), four (4), five (5), eight (8), nine (9) and ten (10) as outlined under recommendation one (1).

## Exhibit A – Summary of Original Audit Results

Finding	Summary Finding								
1	<p>The District has a framework in place to support students in middle and high school with instruction in high school readiness, career, and the creation of a personal graduation plan. However, there are not sufficient written procedures to support consistency and continuity of the process and documentation requirements.</p> <p>We found 20% (33 of 167) of students tested did not have their PGP/endorsement (or at least the signature page referred to by management as the endorsement) in their cumulative education record (CUM). Of the 134 students with a PGP/endorsement in their CUM, 5% (7 of 134) did not have a student and/or parent signature.</p> <p>The TEC 28.02121 requires the original PGP/endorsement be signed by the student and student's parent/guardian. According to management, the signed PGP/endorsement is filed in the student's cumulative education record (CUM). However, the requirement the PGP/endorsement be signed and filed in the CUM is not outlined in District procedures to support consistency and continuity of the process and documentation requirements.</p>								
2	<p>We identified 11% (17 of 150) of non-transfer students tested did not have a PGP/endorsement created before entering the ninth grade. All 17 of these students subsequently created a PGP/endorsement in a future grade level, as shown in the table below:</p> <table border="1"> <thead> <tr> <th>Grade Level</th><th>Total</th></tr> </thead> <tbody> <tr> <td>9</td><td>15</td></tr> <tr> <td>10</td><td>1</td></tr> <tr> <td>12</td><td>1</td></tr> </tbody> </table> <p>We were unable to determine whether 19% (29 of 150) of non-transfer students tested had a PGP/endorsement created before ninth grade because no form was located in the CUM.</p> <p>District management stated, that prior to 9<sup>th</sup> grade all students are enrolled in Touch System Data Entry (TSDE), create a Personal Graduation Plan (PGP), and select endorsement(s) in CCRP. The district has a framework in place to provide students in middle school with instruction in high school readiness, career, and the creation of a personal graduation plan. However, there are not sufficient written procedures to support the consistency of the process and documentation requirements.</p>	Grade Level	Total	9	15	10	1	12	1
Grade Level	Total								
9	15								
10	1								
12	1								
3	<p>We identified 26% (six of 23) of the students tested who opted out of earning an endorsement did not have the TEA form "Foundation High School Program, Endorsement Opt-Out Agreement" in their CUM. We were able to confirm the students that opted out of earning an endorsement were in 11<sup>th</sup> or 12<sup>th</sup> grade.</p> <p>After their sophomore year, a student may choose to graduate under the foundation high school program without earning an endorsement. However, a parent must file with a school counselor written permission on the TEA form, "Foundation High School Program, Endorsement Opt-Out Agreement." District management stated the aforementioned form is filed in the student's CUM. However, the requirement the form be filed in the CUM is not outlined in the District's written procedures to support consistency of the process and documentation requirements.</p>								

Finding	Summary Finding
4	<p>We identified 28% (seven of 25) of the students tested that changed their graduation plan did not have a "Foundation High School Program (HB 5) Change in Graduation Plan" form in their CUM. In addition, 32% (eight of 25) of the students that had the form in their CUM did not have the appropriate documentation (current grades, copy of audit card, Foundation HS Program Opt-Out Agreement, current attendance, EOC scores, current transcript) attached as required by the form.</p> <p>According to management, students may change their graduation plan. The District has a framework in place for students in EPISD to begin with the District's default graduation plan, which includes the DLA and an endorsement. District management stated that a "Foundation High School Program (HB 5) Change in Graduation Plan" form must be completed and filed in the student's CUM when a student changes their graduation plan. This indicates the student will not pursue the District's default graduation plan and pursue another graduation plan endorsed by HB 5. If a student amends their graduation plan, the District must send written notice to the parent regarding the change (TEC 28.02121).</p> <p>Although the District has a framework, we found there are not sufficient written procedures to support the consistency and continuity of the process and documentation requirements.</p>
5	<p>Of the 33 counselors who responded to our survey 33% (11) stated, "It is not possible to meet with all students assigned to me in one year" when asked how many times they meet individually with students to counsel/prepare them for high school, college, and a career during a school year. The TEC 33.007 requires advising to students and their parent(s) each year they are enrolled in high school. The TEC does not specify if advising should be on a one on one basis. Documents provided by District management also do not specify whether counselors should meet with students individually. If counselors do not meet with students on a one on one basis, there is a risk counselors may not identify a student's individual PGP/endorsement needs.</p> <p>In addition, for the other 67% of counselors who indicated they <u>do</u> meet individually with students, we did not see that each student in our sample had counselor notes in CCRP recording individual counseling sessions with students regarding their PGP/endorsement. We did observe the notes in CCRP by counselors were mass notes referencing meetings with a group of students. Management provided a copy of a counselor training PowerPoint on how to enter counselor sessions in CCRP. However, the presentation did not cover expectations for documenting individual counseling sessions with students to discuss their PGP/endorsement in CCRP.</p>
6	<p>Based on the responses to our counselors' survey, it appears not all counselors are aware they have to request CCRP be locked to prevent students from making edits to their PGP/endorsement. Responses to the survey were that 58% of counselors thought that students could not change their endorsement in CCRP without the counselor's knowledge, and 42% responded that students could not make changes.</p> <p>If the student's PGP/endorsement in CCRP is not locked, the student can edit the PGP/endorsement without their counselor's knowledge. This creates a risk the student(s) schedule may not be aligned with the changed PGP/endorsement, and parents may not be provided written notice of the revised PGP/endorsement. We did not find instructions for locking of PGP/endorsement in CCRP by counselors outlined in a written procedure.</p>
7	<p>Of the 33 counselors who responded to our survey, 73% stated they do not obtain a parental/guardian signature each time a student changes their endorsement. Counselor comments for not obtaining signatures included; making notifications on the telephone, signatures not needed because most students do not change endorsements, students do not bring signed paperwork back, and it is not necessary for adult students. There is a risk that confusion may lead to parent/employee complaints regarding the inconsistency in</p>



Finding	Summary Finding
	documenting parent notifications. We did not find instructions for parental/guardian signature requirements when a student changes their endorsement outlined in a written procedure to ensure consistency in documentation requirements.



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